

UNITED STATES OF AMERICA
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

In the Matter of)
PACIFIC GAS AND ELECTRIC COMPANY) Docket Nos. 50-275 O.L.
(Diablo Canyon Nuclear Power Plant,) 50-323 O.L.
Units Nos. 1 and 2))

INTERVENORS' MOTION TO ADD
OVERPRESSURIZATION AND
BACKFITTING CONTENTIONS

Intervenors SCENIC SHORELINE PRESERVATION CONFERENCE,
SAN LUIS OBISPO MOTHERS FOR PEACE, SANDRA SILVER, ECOLOGY ACTION
CLUB and JOHN J. FORSTER respectfully move the Board to add
the following contentions to those made under the Atomic Energy
Act and the National Environmental Policy Act:

1. Whether operation of the Diablo Canyon Nuclear
Generating Station with a reasonable assurance of lack of
danger to the public health and safety as required by 42 U.S.C.
§2232(a) and 10 CFR 50 §57(a)(3)(i) will take place in light
of the threat of recurring overpressurization of the Diablo
Canyon reactor vessels and whether the Staff's Final Environ-
mental Statement and Amendment adequately considers adverse
impacts to the environment that reactor accidents caused by
vessel overpressurization could produce.

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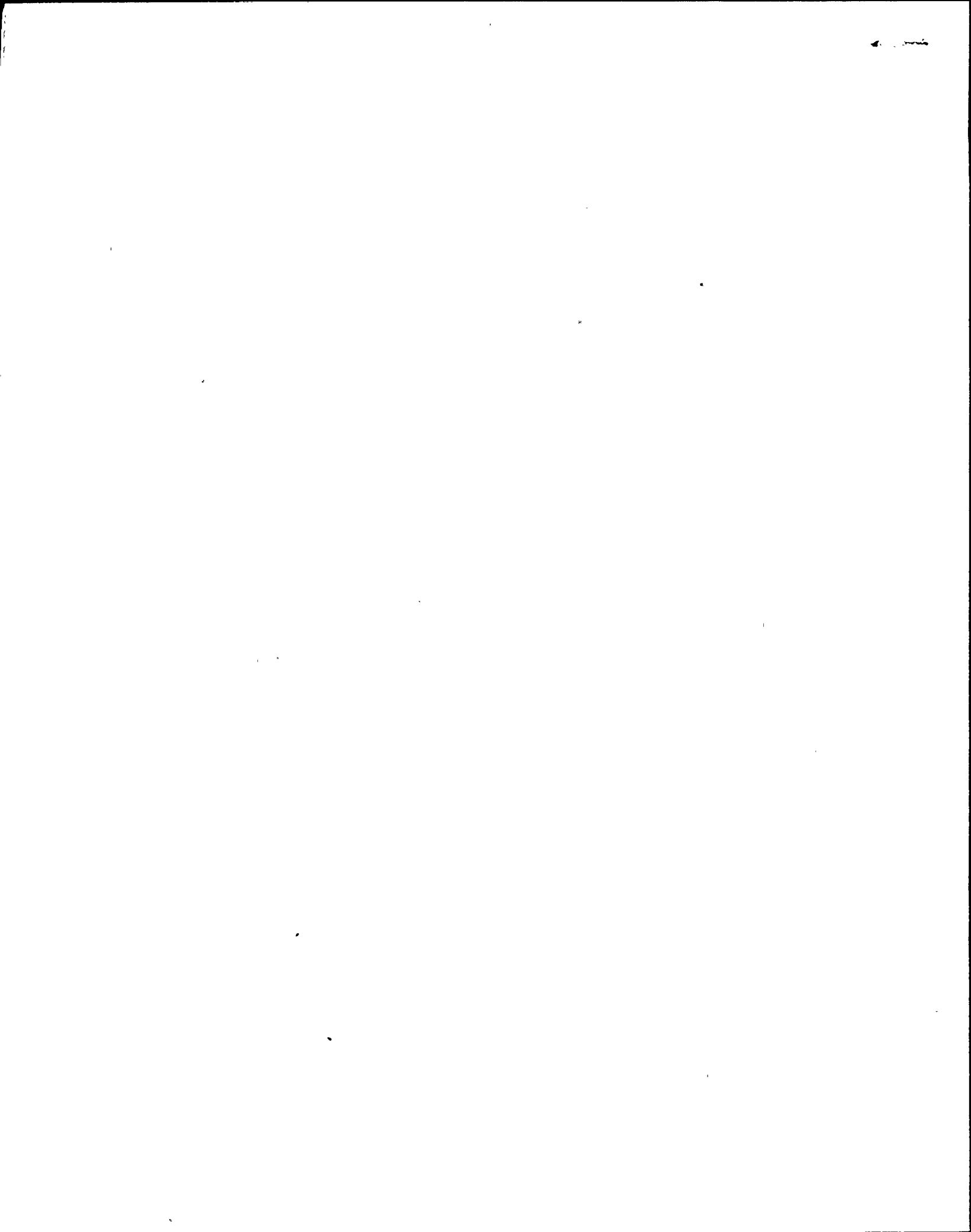
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2. Whether backfitting of the Diablo Canyon Nuclear Generating Station in compliance with the requirements of 10 C.F.R. 50 §109 will provide substantial additional protection to the public health and safety, and, therefore, should be ordered by the Commission and whether the Staff's Final Environmental Statement and Amendment adequately considers adverse impacts to the environment that reactor accidents resulting from lack of backfitting could produce. The backfitting encompassed by this contention includes, but is not limited to, the following design features for structures, systems and components:

- a) Fire Protection
- b) Vessel Supports
- c) Reactor Vessel Overpressurization
- d) Anticipated Transient Without Scram (ATWS)
- e) Seismic Qualification
- f) Electrical Equipment Qualification
- g) Code Compliance: ASME and ANSI
- h) Turbine-Generator Missiles

Intervenors contend that backfitting for the above items and all other features needing backfitting when taken together would produce an especially substantial cumulative addition to the protection of human health and safety and of the environment. Intervenors further contend that in order to enable the Board to adequately consider the degree of backfitting that might afford substantial additional protection to health, safety, and the environment, the applicant and staff should be required



to list all deviations of Diablo Canyon plant features from all current regulations, regulatory guides, and other applicable standards and to document the pros and cons of backfitting each such feature.

Intervenors' motion is accompanied by a Memorandum of Points and Authorities and several affidavits which show good cause for accepting these two contentions.

Dated: March 3, 1977

Respectfully submitted,

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